

1 THE HONORABLE KYMBERLY K. EVANSON

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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 INDEMNITY INSURANCE COMPANY OF
10 NORTH AMERICA, as subrogee of GE
MEDICAL SYSTEMS TRADE AND
DEVELOPMENT (SHANGHAI) CO., LTD.,

11 Plaintiff,

12 v.

13 EXPEDITORS INTERNATIONAL OF
14 WASHINGTON, INC.,

15 Defendant.

NO. 2:23-CV-00507-KKE

STIPULATED MOTION AND
ORDER RE: STATUS
CONFERENCE

16 **STIPULATED MOTION**

17 Pursuant to Federal Rule of Civil Procedure 16(a)(3)-(4) and Local Civil Rule 16(d) the
18 parties, plaintiff Indemnity Insurance Company of North America, as subrogee of GE Medical
19 Systems Trade and Development (Shanghai) Co., Ltd. (“IINA”), and defendant Expeditors
20 International of Washington, Inc. (“Expeditors”), by and through their respective counsel,
21 jointly move this Court for an order setting a status conference (via telephone or
22 videoconference) for discussion of continuing the trial date and pretrial deadlines to
23 facilitate settlement.

24 The parties have engaged in extensive settlement negotiations. Those negotiations
25 involve the claims in this action as well claims currently pending before this Court in Case
26 2:24-cv-00690-JLR, Huatai Property & Casualty Insurance Company Ltd v. Expeditors

STIPULATED MOTION AND ORDER
RE: STATUS CONFERENCE – 1
NO. 2:23-CV-00507-KKE

International of Washington Inc. Although these actions are not related, they involve the same principals and share some common legal issues, and therefore the parties have been exploring the prospects for a global settlement of both actions.

The parties have been unable to reach agreement through informal settlement negotiations, and now believe mediation is appropriate. The parties have identified and agreed upon an appropriate mediator, but between the schedules of the mediator, the parties' decision-makers, and counsel, mediation cannot take place prior to the currently scheduled trial date of April 28, 2025.

The parties believe the just, speedy, and inexpensive determination of this action is best served by continuing the trial date and pretrial deadlines in order to allow sufficient time for the parties to engage in mediation. The parties further believe raising the issue of continuance in a telephonic status conference with the Court presents an efficient and effective means for the parties to advise the Court of the prospects for settlement and discuss scheduling. Accordingly, the parties jointly move this Court for an order setting a status conference for discussion of continuing the trial date and pretrial deadlines to facilitate settlement.

Counsel for plaintiff will be unavailable March 27-29, 2025, but can otherwise accommodate a status conference at any time over the next 3 weeks, Counsel for defendant is generally available, but will need to appear via telephone or videoconference.

DATED this 25th day of March, 2025.

NICOLL BLACK & FEIG PLLC

/s/ Jeremy B. Jones

Jeremy B. Jones, WSBA No. 44138
Attorneys for Plaintiff

BALLARD SPAHR LLP

Via 03/25/25 E-Mail Authorization

/s/ Steve W. Block

Steve W. Block, WSBA No 24299
Attorneys for Defendant

ORDER

The Court GRANTS the parties' stipulated motion for a status conference (Dkt. No. 28) and will contact counsel to schedule a status conference.

Dated this 26th day of March, 2025.

A handwritten signature in black ink, reading "Kimberly K. Evanson". The signature is written in a cursive, flowing style. Below the signature is a solid horizontal line.

Kimberly K. Evanson
United States District Judge